

UNITED STATES DISTRICT COURT
FOR THE EASTERN DIVISION OF TENNESSEE

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AUG 2 2017

Jackqueline M Jordan,
Plaintiff

CLERK, U.S. DIST. COURT
WESTERN DIST. OF TENN

v.

Case No. 1:17-cv-01119-STA-egb

Brimhall Foods Company Inc.,
Defendant

COMPLAINT

Plaintiff Jackqueline M Jordan complaints against Defendant Brimhall Foods Company Inc. as follows:

Jurisdictional Allegation

Jurisdiction in this case is based on subject-matter jurisdiction of the parties and the amount in controversy. Plaintiff Jackqueline M Jordan is a citizen of State of Tennessee. Defendant Brimhall Foods Company Inc. are citizens of State of Tennessee. The amount in controversy exceeds the sum of seventy-five thousand dollars (\$75,000), exclusive of interest and cost.

Statement of Claims

1. On or around 6th of January 2015 Plaintiff Jackqueline Jordan became an antagonist victim of multiple Manager Defendant #1, #2. Unwelcomed xenophobia physical assault-tort of outrage. Discriminatory element Supervisory misconduct – Senior Manager Defendant #1 on two separate occasions. Similar vicarious employer harassment action by Defendant #2 on one occasion. Intimidation.
2. Creating a fallen morale of standard. Atmospheric abuse; environment repulsive activities of conformity. One reactionary response to Defendant(s) first knowledge of... Disbelief this happening (AGAIN) – Report Corporate Irresponsibility. Directly to Housing Director also temporary employer. Advisory action: Statement, Request for Complaint forms Tennessee Human Right Commission transferred to Memphis District office of EEOC. As an (e.g. client of independent contractor)
3. As a result of Physical Discriminatory Relief of proven harm. Defendant(s) upper Senior Supervisory antics; disgruntled gradification. Daily recurrence of present past perpetrator(s). Contributor tort-feasor(s). Insidious introduction of physiological Societal Causative Industrial crimes(s). Sustaining severe patronizing physically consistent injuries, severe headaches, chronic pain and suffering, periodical ER visit(s) – medical and unpaid expenses, emotional disturbance – startled responses; REQUIRED: bi-weekly Mental -Health session(s), Therapy-Counseling/Medication

Demand for Relief

WHEREFORE, the plaintiff demands judgement against defendant for the sum of \$270,000, with interest and costs.

Jury Demand

Plaintiff demands jury trial.

Dated this day of July, 2017